



OFFICE OF THE CORPORATION COUNSEL

VIA FACSIMILE AND E-MAIL ATTACHMENT

August 16, 2006

Edward Marion
Administrative Law Judge
Public Service Commission of Wisconsin
610 North Whitney Way
P.O. Box 7854
Madison, Wisconsin 53707-7854

Re: Application of American Transmission Company, as an Electric Public Utility, to Construct a New Waunakee Substation and Build a New 138 kV Line from the North Madison Substation to the New Waunakee Substation in the Towns of Vienna and Westport, Dane County, Wisconsin
Docket No. 137-CE-139

Dear Judge Marion:

Enclosed for Electronic filing is Dane County's Motion to Intervene in the above-referenced docket. If you have any questions or comments about this filing, please contact me. Thank you for your attention to this matter.

Very truly yours,

Marcia MacKenzie
Dane County Corporation Counsel

Encl.

cc: American Transmission Co.
c/o Attorney Lauren Azar
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1 South Pinckney Street #700
Madison, Wisconsin 53703

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Public Service Commission of Wisconsin
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BEFORE THE
PUBLIC SERVICE COMMISSION OF WISCONSIN

Application of American Transmission Company,
as an Electric Public Utility, to Construct a New 138
kV Line From the North Madison Substation to the
Huiskamp Substation in the Towns of Vienna and
Westport, Dane County, WI

Docket No.
137-CE-139

DANE COUNTY'S MOTION TO INTERVENE
AND NOTICE OF APPEARANCE

TO: THE SECRETARY OF THE PUBLIC SERVICE COMMISSION

Pursuant to §227.44(2m), Wis. Stats., and §PSC 2.21, Wis. Admin. Code, Dane County by its attorneys, Marcia A. MacKenzie, Corporation Counsel and Kristi A Gullen Assistant Corporation Counsel, hereby moves to intervene in the above-captioned matter.

STATEMENT OF INTEREST IN THE PROCEEDING

1. Dane County is a quasi-municipal corporation created pursuant to Ch. 59, Wis. Stats., and has its principal offices located at c/o Dane County Clerk, 210 Martin Luther King, Jr. Blvd., Room 112, Madison, Wisconsin 53703.
2. The County has a substantial interest in this proceeding in that the proposed transmission line would be located in Dane County. Dane County, through its various Boards, Committees and Commissions, has expertise in the areas of land use, environment protection, lakes and watershed, and long range planning.

3. Dane County has an established history of protecting the interests of its citizens by engaging in thoughtful long-range planning which protects the environment.

WHEREFORE,

1. Dane County is entitled to intervention by right pursuant to Wis. Admin. Code §PSC 2.21(1) because its substantial interests may be affected by Commission action or inaction in this proceeding.

2. Dane County is entitled to permissive intervention pursuant to Wis. Admin. Code §PSC 2.21(2) because its participation will “likely promote the proper disposition of the issues to be determined in this proceeding.”

3. Dane County has interests that differ from, and are not adequately represented by, other parties to this proceeding and thus granting Dane County’s Motion to Intervene will promote the proper disposition of the issues to be determined in this proceeding.

Based on the foregoing, Dane County respectfully requests that the Commission grant this Motion to Intervene and allow it to participate as a full party.

NOTICE OF APPEARANCE

The Office of the Dane County Corporation Counsel, by Marcia A. MacKenzie, Corporation Counsel, hereby files its Notice of Appearance on behalf of Dane County in the above-captioned matter and requests that copies of all further documents and correspondence be served on:

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Dated this 16 day of August, 2006.



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PSC Motion to Intervene